



1           2. The CBP has consented to assume responsibility for the  
2 protection and safety of the defendant during the period the same  
3 remains in *custodia legis*.

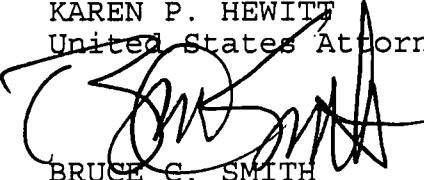
4           3. The continued custody by the CBP following execution of  
5 the warrant of arrest *in rem* is necessary and in the best  
6 interests of the United States in this case given the nature of  
7 the defendant and the expertise within the CBP to provide for the  
8 management, protection and preservation of the defendant.

9           4. It is further requested that all reasonable expenditures  
10 incurred by the CBP be a first charge against the defendant.

11           WHEREFORE, the United States respectfully requests that this  
12 motion to appoint CBP as custodian of the defendant property be  
13 granted.

14           DATED: JUNE 13, 2008

15           KAREN P. HEWITT  
16           United States Attorney

17             
18           BRUCE C. SMITH  
Assistant U.S. Attorney